

ERIC A. SEITZ
ATTORNEY AT LAW
A LAW CORPORATION

ERIC A. SEITZ 1412
LAWRENCE I. KAWASAKI 5820
DELLA A. BELATTI 7945
820 Mililani Street, Suite 714
Honolulu, Hawai'i 96813
Telephone: (808) 533-7434
Facsimile: (808) 545-3608

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I

STEVEN DE COSTA, in his)	CIVIL NO. 03-00598 DAE/LEK
representative capacity as)	
Chairperson of the Board of)	DEFENDANT'S RENEWED
Trustees of United Public Workers,)	MOTION FOR SUMMARY
AFSCME, Local 646, AFL-CIO,)	JUDGMENT; MEMORANDUM
Mutual Aid Trust Fund, Real Party)	IN SUPPORT; CERTIFICATE OF
in interest United Public Workers)	SERVICE
Union, AFSCME, Local 646, AFL-)	
CIO,)	
)	
Plaintiffs,)	
)	(Trial: March 11, 2008)
vs.)	
)	
GARY W. RODRIGUES,)	
)	
Defendant.)	
_____)	

DEFENDANT’S RENEWED MOTION FOR SUMMARY JUDGMENT

Defendant GARY W. RODRIGUES (hereinafter “Rodrigues”), by and through his undersigned attorneys, hereby moves the Court for an order granting summary judgment in his favor as to all claims asserted against him in Plaintiff’s Complaint filed on October 31, 2003.

This motion is brought pursuant to Rules 7, and 56(b), Federal Rules of Civil Procedure, inter alia, and is based upon the attached memorandum in support and attachments hereto, the records and files herein, and the arguments of counsel at the hearing on this motion.

DATED: Honolulu, Hawai’i, October 24, 2007.

/s/ Eric A. Seitz
ERIC A. SEITZ
LAWRENCE I. KAWASAKI
DELLA A. BELATTI

Attorneys for Defendant
Gary W. Rodrigues